

Consulting
Engineers and
Scientists

October 15, 2019

Mr. Grant Evenson
Special Projects Branch
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 E. Flamingo Road, Suite 230
Las Vegas, Nevada 89119-0818

Dear Mr. Evenson:

**Re: Titanium Metals Corporation, Henderson, Nevada Facility,
Facility ID #H000537
Quarterly Status Report for the Third Quarter of 2019 (Q3-19)**

This quarterly status report is submitted on behalf of Titanium Metals Corporation (TIMET). These reports are submitted per Section XIII of the Phase II Consent Agreement (1996). A list of TIMET submittals to NDEP and NDEP documents received by TIMET during Q3-19 is provided as Attachment 1.

Major TIMET project activities during Q3-19 include the following:

SITE-WIDE MANAGEMENT

TIMET continued to provide NDEP with quarterly TIMET project status reports. The Quarterly Status Report for the Second Quarter of 2019 was submitted July 14, 2019.

GROUNDWATER REMEDIATION

The groundwater remediation system has been operating continuously since startup on March 12, 2014. Operations are being monitored in accordance with the NDEP-approved Groundwater Remedial Action Operation and Maintenance Monitoring Sampling and Analysis Plan. Operational data are being collected in accordance with the Plan, and as the data are evaluated, adjustments to system operations are made as appropriate.

The Groundwater Extraction and Treatment System (GWETS) Operations, Maintenance and Performance Report for Second Quarter 2019 was submitted to NDEP on August 29, 2019.

The third quarterly hydraulic head monitoring event for GWETS Performance Monitoring for 2019 was conducted on July 9, 2019.

TIMET continues to work cooperatively with the Nevada Environmental Response Trust (NERT) and NDEP to help identify and implement treatment to remove perchlorate and hexavalent chromium from groundwater extracted by the TIMET GWETS.

SITE COVER SYSTEMS

In accordance with the MPSS, annual inspections of the cover systems for the northern portions of the site including Management Areas 1A, 1B, 2, 3, 4, 5, 7, 8 and Area 13 are performed. In addition, an annual inspection is also performed for the Area 15 cap in accordance with the June 5, 2015 submittal titled "Closure and Post-Closure Care Plan for S-18 Landfill and Adjacent Areas". The 2019 annual inspections are scheduled to be completed during the fourth quarter of 2019.

SITE INVESTIGATIONS

Investigations of Management Areas 19 and 21 are complete. Reports are in progress.

SCHEDULE OF UPCOMING PLANNED PROJECT ACTIVITIES

Recurring Submittals and Activities During Fourth Quarter of 2019:

<i>Activity</i>	<i>Date</i>
GWETS Quarterly O&M and Performance Report	November 2019
"Quarterly" Extraction Well Sampling	October 2019
Semiannual Groundwater Sampling	October 2019

Non-Recurring Project Activities During 2019:

An updated schedule for remaining investigation and remediation activities was submitted to NDEP by email dated October 14, 2019.

If you have any questions regarding this submittal, please contact the undersigned at (716) 204-7158 (email: kmcintosh@geiconsultants.com) or Mr. Richard Pfarrer of TIMET at (702) 566-4453 (email: Richard.Pfarrer@Timet.com).

Page 3
Mr. Grant Evenson
Nevada Division of Environmental Protection
October 15, 2019

JURAT

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances.

For the services provided and attested to with this Jurat including compilation of information in this TIMET Quarterly Status Report for the Third Quarter of 2019.

GEI CONSULTANTS, INC., P.C.

A handwritten signature in dark ink, appearing to read "Kelly R. McIntosh", with a stylized flourish at the end.

Kelly R. McIntosh
Senior Consultant
Nevada Certified Environmental Manager
EM No. 2199; Expires September 28, 2021
Date Signed: October 15, 2019

Page 4
Mr. Grant Evenson
Nevada Division of Environmental Protection
October 15, 2019

cc: Richard Pfarrer, TIMET, hard copy & efile
JD Dotchin, NDEP, Las Vegas, Nevada, efile
Carlton Parker, NDEP, Las Vegas, Nevada, efile
BMI Compliance Coordinator, NDEP, Las Vegas, Nevada, hard copy and efile
Alison Fong – USEPA Region 9, efile
Christopher Rollins – USEPA Region 9, efile
Kirk Stowers- Broadbent, efile
Jeff Gibson, AMPAC, efile
Mark Paris – BMI, efile
Lee Farris – BMI, efile
Ranajit Sahu – BMI, efile
Ed Modiano – OSSM GWTS, efile
Joe Kelly – Montrose, efile
Jay Steinberg – NERT, efile
Allan DeLorme – NERT, efile
John Pekala – NERT, efile
Dave Share – Olin, efile
Chuck Elmendorf – Stauffer, efile
George Crouse – Syngenta, efile
Enoe Marcum, WAPA, efile

Attachment 1 – Q3-19 Document Submittals and Receipts

Documents submitted by TIMET to NDEP during the period 7/1/19 to 9/30/19

7/14/19 – TIMET Quarterly Status Report for the Second Quarter of 2019.

7/31/19 – Data Validation Summary Report, Area 16, 17 and 18 Soil Samples (Collected January 2019)

8/29/19 – Groundwater Extraction and Treatment System Operations, Maintenance and Performance Report (Second Quarter 2019).

9/17/19 – Data Validation Summary Report, Semiannual Reporting of Groundwater Monitoring Data, First Semester 2019

Documents received by TIMET from NDEP during the period 7/1/19 to 9/30/19

8/22/19 – NDEP Response to: TIMET Second Quarter 2019 Status Report dated July 14, 2019 (*the deliverable was approved*).

8/22/19 – NDEP Response to: Semiannual Reporting of Groundwater Monitoring Data, Second Semester 2018, dated February 28, 2019 (*the deliverable was approved*).

8/22/19 – NDEP Response to: Groundwater Extraction and Treatment System Operations, Maintenance and Performance Report (First Quarter 2019), dated May 31, 2019 (*the deliverable was approved*).

8/22/19 – NDEP Response to: Request for Administrative Closure Area 13, dated June 2017 (*the deliverable was approved*).